

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

CIVIL ACTION NO. 1:22-cv-102

JOE and IRENE VALENTINE

Plaintiff,

v.

TOWN OF CHAPEL HILL

Defendant.

**RESPONSE TO MOTION TO
DISMISS**

COMES NOW, Joe and Irene Valentine (hereinafter "Plaintiffs"), and objects to Defendant's Motion to Dismiss filed May 19, 2022 for the reasons set forth in Plaintiffs brief filed simultaneously herewith.

WHEREFORE, Plaintiffs pray that the Court:

1. Deny Defendant's Motion.
2. Grant such further relief as the court deems appropriate.

Respectfully submitted, this is the ____ day of June, 2022.

BA FOLK, PLLC

/s/ Randy H. Herman
Randy H. Herman
N.C. Bar No. 46101
P.O. Box 90426
Raleigh, NC 27675
rherman@bafolk.com
(o) 919-825-1250
(f) 919.882.8297